

MARASHI LEGAL

CIVIL RIGHTS LAW + POLICY

ELECTRONICALLY FILED

DOC#: DATE FILED: 3/25/2024

P. JENNY MARASHI, ESQ. 930 Grand Concourse #1E Bronx, NY 10451 marashi.legal@gmail.com +1-917-703-1742

March 22, 2024

VIA ECF

Honorable Andrew L. Carter District Court Judge United States District Court Southern District of New York 40 Foley Square, Room 435 New York, NY 10007 ALCarterNYSDChambers@nysd.uscourts.gov

> Re: Sean Hall v. City of New York, et al 21-cv-02308-ALC

Your Honor:

This firm, and Mr. Eric Levy, represent Plaintiff Sean Hall. Alejandra R. Gil, Esq. of Heidell, Pittoni, Murphy & Bach joins in this statement on behalf of The City of New York and New York City Health & Hospitals Corporation. Parties are requesting an extension of time to submit the Opposition Memorandum to Defendants' Motion for Summary Judgment, and Opposition to Plaintiff's Motion for Partial Summary Judgment. The present due date is April 1, 2024. Parties are requesting a two and a half week extension to April 19, 2024. This is Parties' first request for an extension on the opposition motions. If it is granted, Parties respectfully request that the reply deadline be moved in kind, from April 22, to May 10, 2024.

Thank you for your time and attention to this request.

Respectfully submitted,

Marashi Legal

930 Grand Concourse, #1E Bronx, NY 10451 (917) 703-1742 marashi.legal@gmail.com

Attorneys for Plaintiff

Alejandra R. Gil, Esq. Heidell, Pittoni, Murphy & Bach, LLP 81 Main Street

White Plains, NY 10601 (914) 559-3100 agil@hpmb.com

Attorneys for Defendants
THE CITY OF NEW YORK and NEW YORK
CITY HEALTH AND HOSPITALS
CORPORATION

HON, ANDREW L. CARTER, JR. UNITED STATES DISTRICT JUDGE

Dated: March 25, 2024